

## REMARKS

In the Office Action mailed the Examiner noted that claims 1-31 were pending, and rejected all claims. Claims 11, 13, 15, 17-22, 25, 27, 29 and 30 have been amended, claim 7 has been canceled, new claims 32 and 33 have been added and, thus, in view of the forgoing claims 1-6 and 8-33 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

Page 2 of the Office Action rejects all claims under 35 U.S.C. § 103 over Yumoto and Kumagai.

Yumoto is directed to a graphic processing system that divides graphic data into optimally sized blocks so that can be handled by a computer. The blocks of data are then distributed to a plurality of computers for processing.

Kumagai is directed to a system of connected workstations where each workstation can access an image stored in another workstation, for convenience called a server. Portions of the image are processed by each of the workstations. As a result, Kumagai, like Yumoto, is directed to distributed processing of an image.

The present invention (see claims 1-6 and 29) is directed to a system divides a target image into portions ("divided images") for distributed processing. The system then transfers ("distributing") the portions to be processed to image generation devices where the image portions can be edited. The edited portions of the images edited in the image generation devices are then integrated. Allowing the target image to be processed in a distributed and faster matter. The invention also contributes to the editing efficiency and accuracy by also transferring or "distributing" a "reference" image "corresponding to the target" to each of the image generation devices. This allows the image portion being processed in each image editing device to be displayed along with the reference image ("displaying the divided image and the reference image"). This allows the editor to see the entire target image while editing the portion allocated to this particular editor. This improves the accuracy and efficiency of the editing process because mistakes in editing can be avoided. Yumoto and Kumagai, together or alone, do not teach or suggest such an improved editing system where the editing device has both a portion of the target image being edited and a correspondence to the target image as a reference.

The present invention in addition to distributing image portions as discussed above also distributes information about image movement defining a moving picture (see claims 11, 2, 25,

27 and 30) or how elements within the image move (see claim 13) to the editing units. Nothing in Yumoto and Kumagai teach or suggest this.

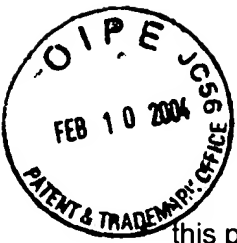
The present invention (see claims 23, 26, 28 and 31), in addition to distributing image portions to different devices, also transmits an edited image from the editing device upon a command to do so from the image distribution device or at predetermined time intervals. In contrast, Kumagai allows one user at a first workstation to initiate an editing window in a second workstation presumably to allow the second workstation to access and process the portion of the image for the second workstation. Nothing in Yumoto and Kumagai teach or suggest transmitting edited images as in the present invention.

It is submitted that the invention of independent claims distinguishes over the prior art and withdrawal of the rejection is requested.

The dependent claims depend from the above-discussed independent claims and are patentable over the prior art for the reasons discussed above. The dependent claims also recite additional features not taught or suggested by the prior art. For example, claim 9 emphasizes distribution of image layers and image layer identifiers. Nothing in Yumoto and Kumagai teach or suggest such. It is submitted that the dependent claims are independently patentable over the prior art.

New claim 32 emphasizes the transferring of an image portion to be edited along with the entire image to allow an editor to edit the portion while referencing the entire image. New claim 33 emphasizes that the edits are transferred made by the editors are transferred to the editors so that the editors can see the changes in the image as it progresses so that they can tailor their editing accordingly. Nothing in the prior art teaches or suggests such. It is submitted that these new claims, which are different and not narrower than prior filed claims distinguish over the prior art.

It is further submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.



Serial No. 09/911,419

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: 2/9/04

By: *J. Randall Beckers*  
J. Randall Beckers  
Registration No. 30,358

1201 New York Avenue, NW, Suite 700  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501

CERTIFICATE UNDER 37 CFR 1.8(a)  
I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on Feb. 20 2004  
By *Made Salera*  
Date 2/9/04